

# **EXHIBIT L**

NO. GV002327

THE STATE OF TEXAS	)	IN THE DISTRICT COURT
ex rel.	)	
VEN-A-CARE OF THE	)	
FLORIDA KEYS, INC.,	)	
Plaintiff(s),	)	
VS.	)	TRAVIS COUNTY, TEXAS
DEY, INC.; ROXANE	)	
LABORATORIES, INC., WARRICK	)	
PHARMACEUTICALS CORPORATION,	)	
SCHERING CORPORATION,	)	
SCHERING-PLOUGH CORPORATION,	)	
LIPHA, S.A., MERCK-LIPHA,	)	
S.A., MERCK, KGAA, and EMD	)	
PHARMACEUTICALS, INC.,	)	
Defendant(s).	)	53RD JUDICIAL DISTRICT

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ORAL AND VIDEOTAPED DEPOSITION OF

LUIS COBO

March 3rd, 2003

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ORAL AND VIDEOTAPED DEPOSITION OF LUIS COBO,  
 produced as a witness at the instance of the  
 Defendant(s), and duly sworn, was taken in the  
 above-styled and numbered cause on March 3rd, 2003,  
 from 9:15 a.m. to 4:56 p.m., before Cynthia Vohlken,  
 CSR in and for the State of Texas, reported by machine  
 shorthand, at the Office of the Attorney General, 300  
 W. 15th Street, 9th Floor, Austin, Texas pursuant to  
 the Texas Rules of Civil Procedure.

1 Q. Well, what I'm just trying to understand, the  
2 other places that you've worked as a pharmacist since  
3 you've become a licensed pharmacist, and we've got the  
4 hospital and you've told us Ven-A-Care and we've got  
5 Cobo Pharmacy, are there any other places besides  
6 those three places that you've worked as a pharmacist  
7 since becoming licensed in 1976?

8 A. No.

9 Q. Okay. When was Ven-A-Care formed?

10 A. 1987 I believe is when it was incorporated.

11 Q. And you were involved in the corporation of  
12 Ven-A-Care; is that correct?

13 A. In the formation of the corporation, yes.

14 Q. Right. You were one of the founding members  
15 of Ven-A-Care, correct?

16 A. Yes, sir.

17 Q. Was it your idea to form Ven-A-Care?

18 A. No, not -- not uniquely. It was pretty much  
19 a brain child of an interaction with a -- with a  
20 school friend of mine who had an ongoing infusion  
21 pharmacy in the Miami area and had contacted me one  
22 day to see if I would act as an intermediary in  
23 getting some medications and supplies to a patient  
24 that he was servicing in Key West.  
25 Coincidentally in that same time frame I